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Submitting Organization		
ROHR INDUS INC		
Contractor		
KLEINFELDER		
Document Title		
LETTER CONCERNING THE INITIATION OF A RISK ASSESSMENT MODELLING STUDY ON SEVEN CHEMICALS		
Chemical Category		
4, 4'-DIPHENYLMETHANE DIISOCYANATE (101-68-8)		

HAND Delivered

8(d)



ROHR INDUSTRIES, INC.

PO. BOX 878
CHULA VISTA, CALIFORNIA 91912-0878

(619) 591-4111 • TELEX: 69-5038

April 9, 1992

VIA: Courier

Document Processing Center (TS-790)
Room L-100
Office of Toxic Substances
Environmental Protection Agency
1200 K Street, S.W.
Washington, D.C. 20460

92 APR 10 AM 9:14

Dear Sir or Madam,

Pursuant to TSCA Section 8(d) and 40 CFR Part 716, Rohr, Inc. is submitting the attached list of 8(d) chemicals on which a health and safety study was recently initiated on Rohr's behalf. The list refers to a single study involving a risk assessment based on modelling exposures from seven chemicals listed in 40 CFR Section 716.120:

- o Methyl Chloroform
CAS #71-55-6
- o Methylene Chloride
CAS #75-09-2
- o Perchloroethylene
CAS #127-18-4
- o Phenol
CAS #108-95-2
- o 4,4' - Diphenylmethane Diisocyanate (aka: benzene, 1,1'-methylenebis[4-isocyanato-, MDI)
CAS #101-68-8
- o Hexamethylene Diisocyanate Monomer (aka: Hexane, 1,6-diisocyanato-)
CAS #822-06-0
- o Monomeric Toluene Diisocyanate (aka: Benzene, 1,3-diisocyanatomethyl-, TDI)
CAS #26471-62-5

The risk assessment is part of a series of requirements for estimating and evaluating facility releases under the California Air Toxics Hot Spots Information and

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Assessment Act (AB 2588).

Should you have any questions or need further clarification, please do not hesitate to contact me.

Sincerely,

Diane K. Napolitano

Diane K. Napolitano, CIH
Manager, Corporate Safety and Health
(619) 691-6693

attachment

TSCA Section 8(d) Studies
Initiated on Behalf of Rohr, Inc.

Rohr, Inc. is notifying the Environmental Protection Agency of the start of a study on 4,4'- Diphenylmethane Diisocyanate (aka: Benzene, 1,1'- methylenebis[4-isocyanato-, MDI) (CAS# 101-68-8).

- o Start Date: March 20, 1992
- o Purpose: To assess, based on available empirical data, the potential risk of human health posed by airborne MDI facility emissions.
- o Types of data collected: MDI emissions, modelling data on dispersion and availability for exposure; exposure assessment, and risk assessment.
- o Anticipated Date of Completion: May 8, 1992
- o Organization Conducting Risk Assessment:

Kleinfelder
9555 Chesapeake Drive, Suite 101
San Diego, California 92123

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